Fill in this information to identify the case:

Debtor 1 MOHAMED ZEDAN

Debtor 2 -
(Spouse, if filing)

United States Bankruptcy Court for the: Eastern District of Pennsylvania

Case number 19-14675-pmm

Form 4100R

Response to Notice of Final Cure Payment

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

Part 1: Mortgage Information

Name of Creditor: Wells Fargo Bank, N.A.

Court claim no. (if known): 3

Last 4 digits of any number you use to identify the debtor's account: 3641

Property address: 48 Freedom Ter
Number Street
Easton, PA 18045
City State ZIP Code

Part 2: Prepetition Default Payments

Check one:

☒ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.

☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: $ ______________

Part 3: Postpetition Mortgage Payment

Check one:

☒ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on: 11/01/2024
MM/DD/YYYY

☐ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

a. Total postpetition ongoing payments due: (a) $ ______________

b. Total fees, charges, expenses, escrow, and costs outstanding: +(b) $ ______________

c. **Total**. Add lines a and b. (c) $ ______________

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on: ______________
MM/DD/YYYY

Debtor1 MOHAMED ZEDAN
First Middle Last

Case number *(if known)* 19-14675-pmm

Part 4: Itemized Payment History

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- all payments received;
- all fees, costs, escrow, and expenses assessed to the mortgage; and
- all amounts the creditor contends remain unpaid.

Part 5: Sign Here

The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.

Check the appropriate box::

☐ I am the creditor.
☒ I am the creditor's authorized agent.

I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

✘ /s/Andrew Spivack Date 10/14/2024
Signature

Print Andrew Spivack Title Attorney
First Name Middle Name Last Name

Company Brock & Scott, PLLC

If different from the notice address listed on the proof of claim to which this response applies:

Address 3825 Forrestgate Dr.
Number Street

Winston-Salem, NC 27103
City State ZIP Code

Contact phone 844-856-6646 Email PABKR@brockandscott.com

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA
Reading Division

IN RE: MOHAMED ZEDAN	Case No. 19-14675-pmm Chapter 13
Wells Fargo Bank, N.A., Movant vs. MOHAMED ZEDAN , Debtor	

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and exact copy of the foregoing Response to Notice of Final Cure Payment has been electronically served or mailed, postage prepaid on this day to the following:

Via Electronic Notice:

Michael A. Cibik, Debtor's Attorney
1500 Walnut Street
Suite 900
Philadelphia, PA 19102
help@cibiklaw.com

Scott F. Waterman [Chapter 13], Bankruptcy Trustee
2901 St. Lawrence Ave.
Suite 100
Reading, PA 19606

Office of the U.S. Trustee, US Trustee
Robert N.C. Nix Federal Building
Suite 320
Philadelphia, PA 19107

Via First Class Mail:

Mohamed Zedan
48 Freedom Ter
Easton, PA 18045

Date: October 14, 2024

/s/Andrew Spivack

Andrew Spivack, PA Bar No. 84439
Matthew Fissel, PA Bar No. 314567
Mario Hanyon, PA Bar No. 203993
Ryan Starks, PA Bar No. 330002
Jay Jones, PA Bar No. 86657
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